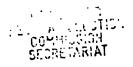


FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463



2011 MAR 16 P 4: 23

SENSITIVE

MEMORANDUM

3 TO: The Commission

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Christopher Hughey

FROM:

Acting General Counsel

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Kathleen M. Guith

Acting Associate General Counsel for Enforcement

BY:

Susan L. Lebeaux

12 13 14 Acting Deputy Associate General Counsel for Enforcement

Christine C. Gallagher

Attorney

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MUR 6454 (Evan H. Snapper) Pre-Probable Cause Conciliation **SUBJECT:**

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Attached is a proposed conciliation agreement signed by Evan H. Snapper ("Respondent"). The conciliation agreement settles knowing and willful violations of 2 U.S.C. § 441f by the Respondent for reimbursing his own and other individuals' contributions to federal candidates during the 2007-2008 election cycle. Mr. Snapper, a former principal at Anchin, Block & Anchin, LLP, reimbursed his and his wife's contributions in the amount of \$13,800 to the Gilmore Presidential and Senate Committees and his and various individuals' contributions in the amount of \$48,300 to the Hillary Clinton for President Campaign with the funds of his client's accounts at Anchin, Block & Anchin, LLP, an accounting and business management firm. Attachment 1.

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In sum, we believe the negotiated agreement represents a reasonable compromise under the circumstances. Therefore, we recommend that the Commission accept the attached conciliation agreement signed by Mr. Snapper and close the file as to this Respondent.

1. Accept the attached conciliation agreement with Evan H. Snapper;

RECOMMENDATIONS:

- 38392. Approve the appropriate letter;
- 40413. Close the file as to Evan H. Snapper.